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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

NORTHERN ALASKA ENVIRONMENTAL  
CENTER, ALASKA WILDERNESS LEAGUE,  
DEFENDERS OF WILDLIFE, THE SIERRA  
CLUB, and THE WILDERNESS SOCIETY,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF THE  
INTERIOR, BUREAU OF LAND  
MANAGEMENT, DAVID BERNHARDT, in  
his official capacity as Secretary of the Interior,  
and WILLIAM PERRY PENDLEY, in his  
official capacity as the official exercising the  
authority of the Director of the Bureau of Land  
Management,

Defendants.

No.: 3:20-cv-00114-SLG

**UNOPPOSED MOTION TO INTERVENE**

*NAEC, et al. v. U.S. Dept. of the Interior, et al.*  
Case No. 3:20-cv-00114-SLG 1

Pursuant to Rule 24 of the Federal Rules of Civil Procedure, ConocoPhillips Alaska, Inc. (“ConocoPhillips”) respectfully requests leave to intervene as a defendant in this civil action, and to assert the defenses set forth in its accompanying proposed Answer. As set forth more fully in the accompanying Memorandum and the Declaration of John F. Schell, Jr. in accordance with Rule 24(a):

1. This motion to intervene is timely;
2. ConocoPhillips has an interest relating to the transactions that are the subject of this action;
3. ConocoPhillips is so situated that disposition of this action may as a practical matter impede or impair its ability to protect its interests; and
4. ConocoPhillips’ interests may not be adequately represented by existing parties.

Alternatively, in accordance with Rule 24(b), ConocoPhillips requests permissive intervention because its claims and defenses have questions of law and fact in common with those raised in this action and intervention will not unduly delay or prejudice the adjudication of the rights of the other parties.

As set forth in the Declaration of James Feldman, ConocoPhillips’ counsel has contacted counsel for the parties to this litigation regarding this motion. Federal Defendants do not oppose ConocoPhillips’ motion to intervene. Plaintiffs also do not oppose ConocoPhillips’ motion to intervene.

ConocoPhillips respectfully requests that this Court enter the proposed order, filed with this motion, granting it leave to intervene in this action and directing that ConocoPhillips file its Answer within 14 days of when the stay ordered in this case is lifted.<sup>1</sup>

DATED: June 24, 2020

STOEL RIVES LLP

By: /s/ James C. Feldman

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<sup>1</sup> See Dkt. 7 (order staying proceedings). The parties' joint motion to stay states: "This motion to stay is not intended to interfere with the court's adjudication of a motion to intervene, should there be one." Dkt. 6 at 2 n.1.

**CERTIFICATE OF SERVICE**

I hereby certify that on June 24, 2020, I filed a true and correct copy of the foregoing document with the Clerk of the Court for the United States District Court of Alaska by using the CM/ECF system. Participants in this Case No. 3:20-cv-00114-SLG who are registered CM/ECF users will be served by the CM/ECF system.

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